IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS

| PUBLIC HEALTH AND MEDICAL PROFESSIONALS FOR TRANSPARENCY, |))) |
|---|------------------------------------|
| Plaintiff, |)) |
| v. |) Civil Action No. 4:21-cv-01058-P |
| UNITED STATES FOOD AND DRUG ADMINISTRATION, |))) |
| Defendant. |))) |

JOINT STATUS REPORT

Pursuant to the Court's Order dated January 6, 2022 (Dkt. No. 35), the parties hereby submit the instant Joint Status Report ("JSR").

As the parties reported in their last JSR, *see* Dkt. No. 76, the U.S. Food and Drug Administration ("FDA") represented that it completed its processing and/or production (of a total of approximately 1.2 million pages of records) on November 1, 2023, and Plaintiff provided questions to FDA on March 13, 2024 regarding certain aspects of FDA's search. FDA is presently reviewing Plaintiff's questions, and the parties will continue to confer with the shared goal of narrowing or resolving any issues that may otherwise require judicial resolution. The parties anticipate that, in their next JSR, they will provide the Court with a further update regarding their conferral process.

Recognizing the Court's Order of January 6, 2022, ECF No. 35, the parties would like to submit another joint status report within 60 days and do so at that frequency thereafter. The parties agree that this will help expedite resolution of any outstanding issues.

Dated: June 17, 2024

Respectfully submitted,

SIRI & GLIMSTAD LLP

/s/ Elizabeth A. Brehm

Elizabeth A. Brehm, NY Bar No. 4660353 200 Park Avenue 17th Floor New York, New York 10166

Tel: (212) 532-1091 ebrehm@sirillp.com

Attorney for Plaintiff

BRIAN M. BOYNTON Principal Deputy Assistant Attorney General Civil Division

ELIZABETH J. SHAPIRO Deputy Director Federal Programs Branch

/s/ Andrew F. Freidah

ANDREW F. FREIDAH
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs
Branch
1100 L Street NW
Washington, D.C. 20005
Tel: (202) 305-0879

Email: andrew.f.freidah@usdoj.gov

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2024, I electronically transmitted the foregoing to the parties and the clerk of court for the United States District Court for the Northern District of Texas using the CM/ECF filing system.

/s/ Andrew F. Freidah
ANDREW F. FREIDAH
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, D.C. 20005
Tel: (202) 305-0879

Email: andrew.f.freidah@usdoj.gov